

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

<b>In the Matter of the Petition</b>	
<b>Of</b>	<b>Case No. 24-cv-941- JKB</b>
<b>GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI,</b>	<b><u>IN ADMIRALTY</u></b>
<b>And</b>	<b>Request for International Judicial Assistance Pursuant to Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters</b>
<b>SYNERGY MARINE PTE LTD, as Manager of the M/V DALI,</b>	
<b>for Exoneration from or Limitation of Liability</b>	

**LETTER OF REQUEST**

*Request for International Judicial Assistance  
Pursuant to the Hague Convention of 18 March 1970 on  
the Taking of Evidence in Civil or Commercial Matters*

By the United States District Court,

District of Maryland

Hon. James K. Bredar

**TO THE MINISTRY OF JUSTICE OF THE KINGDOM OF DENMARK:**

The District of Maryland presents its compliments to the appropriate judicial authority of the Ministry of Justice of the Kingdom of Denmark and requests international judicial assistance to obtain communications between Alpha Ori, Zero North, and the owners and Operators of the M/V DALI regarding the use of SMARTShip on the M/V DALI.

This Court requests the assistance described herein pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, as adopted and implemented in the United States of America at 28 U.S.C. § 1781, and in the Kingdom of Denmark by the Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters. The District of Maryland is a competent court of law and equity which properly has jurisdiction over this proceeding and has the power to compel the attendance of witnesses and production of documents both within and outside its jurisdiction.

The communications between Alpha Ori, Zero North, and the owners and Operators of the M/V DALI regarding the use of SMARTShip on the M/V DALI is intended for use in *In the Matter of the Petition of GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI, and SYNERGY MARINE PTE LTD, as Manager of the M/V DALI, for Exoneration from or Limitation of Liability*, Docket No. JKB 24-cv-941, and in the view of this Court will be highly relevant to the claims against the Petitioners related to the M/V DALI's management and operation.

This request is made with the understanding that it will in no way require any persons to commit any offense, or to undergo a broader form of inquiry than they would if the litigation were conducted in Denmark. In the proper exercise of its authority, this Court has determined that all communications between Alpha Ori and ZeroNorth with Grace Ocean Private Limited, Synergy Marine Pte Ltd, and Maersk A/S relating in any way to the installation and operation of SMARTShip on the M/V DALI should be secured with the intervention of the Ministry of Justice of Denmark.

**1. Senders**

Hon. Timothy J. Sullivan  
District Judge  
United States District Court, District of Maryland  
101 West Lombard Street  
Chambers 5A  
Baltimore, MD 21201  
United States of America

**2. Central Authority of the Requested State**

Ministry of Justice  
Procedural Law Division  
Slotsholmsgade 10  
1216 COPENHAGEN K  
Denmark

**3. Person to whom the executed request is to be returned**

Margaret Fonshell Ward  
Downs Ward Bender Herzog & Kintigh, P.A.  
Executive Plaza III, Suite 400  
11350 McCormick Road  
Hunt Valley, Maryland 21031  
United States of America  
Telephone: +1 443 589 3313  
Email: MWard@downs-ward.com

**4. Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request**

30 March 2025

**5. IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOR TO SUBMIT THE FOLLOWING REQUEST:**

**a. Requesting judicial authority (article 3(a))**

United States District Court  
District of Maryland  
101 West Lombard Street  
Baltimore, MD 21201  
United States of America

**b. To the competent authority of (article 3(a))**

Ministry of Justice  
Procedural Law Division  
Slotsholmsgade 10  
1216 COPENHAGEN K  
Denmark

**c. Name of case and identifying number**

*In the Matter of the Petition of GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI, and SYNERGY MARINE PTE LTD, as Manager of the M/V DALI, for Exoneration from or Limitation of Liability, Docket No. JKB 24-cv-941, United States District Court, District of Maryland*

**6. Names and addresses of the parties and their representatives (including representatives in the requesting state) (article 3(b))**

**a. Petitioners**

Grace Ocean Private Limited  
6 Shenton Way  
#35-01 OUE Downtown Singapore, 068809  
Singapore

**Representatives**

Blank Rome LLP  
William Bennett  
1271 Avenue of the Americas

New York, NY 10020  
Telephone: +1 212 885 5152  
Email: [william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)

AND

Synergy Marine Pte Ltd  
1 Kim Seng Promenade  
#10-11/12 Great World City West Tower, Singapore, 237994  
Singapore

**Representatives**

Blank Rome LLP  
William Bennett  
1271 Avenue of the Americas  
New York, NY 10020  
Telephone: +1 212 885 5152  
Email: [william.bennett@blankrome.com](mailto:william.bennett@blankrome.com)

**b. Claimants**

The State of Maryland  
Office of the Attorney General  
200 St. Paul Place  
Baltimore, MD 21202

**Representatives**

Liskow & Lewis, APLC  
David L. Reisman  
701 Poydras Street  
Suite 5000  
New Orleans, LA 70139  
United States of America  
Telephone: +1 504 556 4016  
Email: [DReisman@liskow.com](mailto:DReisman@liskow.com)

AND

Downs Ward Bender Herzog & Kintigh, P.A.  
Margaret Fonshell Ward  
Executive Plaza III, Suite 400  
11350 McCormick Road  
Hunt Valley, Maryland 21031  
United States of America  
Telephone: +1 443 589 3313  
Email: [MWard@downs-ward.com](mailto:MWard@downs-ward.com)

**c. Additional Claimants**

1. Fornazor International, Inc
2. Hussain Ali Saeed AlDosariy
3. Timothy Mark Wilson (pro se)
4. Zim Integrated Shipping Services, LTD
5. MSC Mediterranean Shipping Company S.A.
6. NAJ Logistics Express, Inc. and Nejoun Al Jazeera Used Cars LLC
7. Wisconsin Spice, Inc.
8. JLJ International Holdings, LLC and Atlantic Specialty Insurance Company
9. ALTS USA, LLC and Atlantic Specialty Insurance Company
10. Skyline International Corporation and Atlantic Specialty Insurance Company
11. Mukesh Desai on behalf R.M Metals, a Division of R.M. Creations
12. Liberty Mutual Insurance Co
13. New York Marine and General Insurance Company and Certain Underwriters at Lloyd's of London, Axis Syndicate 1686
14. MSC Mediterranean Shipping Company S.A. and MSC Mediterranean Shipping Company Holding S.A.
15. Underwood Energy, Inc.
16. R.E. West, Inc.
17. R. Marine Motor Yacht Sales PTY LTD.
18. Captain C. Logistics LLC
19. International Trading Solutions, Inc
20. Penn Manufacturing Industries LLC
21. PMI ENG Exports Private TLD
22. PMI Global Technologies PVT LTD
23. Navision Shipping DK A/S
24. Consol Energy Inc.
25. Star Bulk (Singapore) PTE. LTD's
26. American Sugar Refining, Inc. and Florida Sugar & Molasses Exchange, Inc.
27. PMI ENG Exports Private TLD
28. PMI Global Technologies PVT LTD
29. Gerald Barney
30. Thomas Crawley
31. Ryan Hale
32. Tulani Hasan
33. Donny Jackson
34. Alonzo Key
35. Charles Peacock
36. Douglas Ramos
37. American Publishing, LLC
38. Karen Austin
39. Charles Austin, Jr.
40. Markel Syndicate Management Limited
41. Mayor and City Council of Baltimore

42. Baltimore County
43. Damon Davis
44. Julio Cervantes Suarez and Marisel Hernandez Salgado
45. Ace American Insurance Company
46. Brawner Builders
47. State Farm Insurance Companies
48. Baltimore Gas and Electric Company
49. Zurich American Insurance Co
50. Estate of Carlos Daniel Hernandez Estrella
51. Estate of Alejandro Hernandez Fuente
52. Estate of Miguel Angel Luna
53. Estate of Dorlian Ronial Castillo Cabrera
54. Estate of Maynor Suazo Sandoval
55. Estate of Jose Mynor Lopez

7.

**a. Nature of the action (article 3(c))**

Shipowner's Limitation of Liability action filed by the owners and managers of the M/V DALI for claims arising from the vessel's allision with and destruction of the Francis Scott Key Bridge in Baltimore, Maryland.

**b. Summary of complaint**

Following the allision of the M/V DALI with the Francis Scott Key Bridge in Baltimore, Maryland on 26 March 2024, the vessel's owners and managers filed this Limitation of Liability action, asserting that they should be entitled to limit their liability to the post casualty value of the M/V DALI.

**c. Summary of defenses and counterclaims**

The State of Maryland along with several other claimants have brought claims in the concursus established by the Limitation of Liability action. The State of Maryland and other claimants also assert that because the negligence and unseaworthy conditions that brought about the allision were within the privity and knowledge of the M/V DALI's owners and managers, neither claimant should be entitled to limit its liability.

8.

**a. Evidence to be obtained or other judicial act to be performed (article 3(d))**

All communications between Alpha Ori and ZeroNorth with Grace Ocean Private Limited, Synergy Marine Pte Ltd, and Maersk A/S relating in any way to the installation and operation of SMARTShip on the M/V DALI.

**b. Purpose of the evidence or judicial act sought**

The requested evidence from will help establish the functionality of SMARTShip onboard the M/V DALI, any issues with the operation of SMARTShip on the M/V DALI, and what operational alters the owners and operators of the M/V DALI chose to receive.

**9. Identity and address of any person to be examined (article 3(e))**

ZeroNorth A/S  
Amagerfælledvej 106  
2300 Copenhagen S  
Denmark

**10. Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (article 3(f))**

Not Applicable

**11. Documents or other property to be inspected (article 3(g))**

1. All communications between Alpha Ori and ZeroNorth with Grace Ocean Private Limited, Synergy Marine Pte Ltd, and Maersk A/S relating in any way to the installation and operation of SMARTShip on the M/V DALI.
2. Any service requests or reports, repair reports, or maintenance reports relating in anyway to SMARTShip in the possession of Alpha Ori or ZeroNorth.

**12. Any requirement that the evidence be given on oath or affirmation and any special form to be used (article 3(h))**

Not Applicable

**13. Special methods or procedure to be followed (articles 3(i) and 9)**

Not Applicable

**14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (article 7)**

Please notify the following counsel regarding the time and place for the execution of the Request:

Liskow & Lewis, APLC  
David L. Reisman  
701 Poydras Street  
Suite 5000  
New Orleans, LA 70139  
United States of America  
Telephone: +1 504 556 4016  
Email: DReisman@liskow.com

**15. Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (article 8)**

No attendance of judicial personnel is requested.

**16. Specification of privilege or duty to refuse to give evidence under the law of the State of origin (article 11(b))**

Not Applicable

**17. The fees and costs incurred which are reimbursable under the second paragraph of article 14 or under article 26 of the Convention will be borne by**

The State of Maryland

**18. Date of Request**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Timothy J. Sullivan  
United State Magistrate Judge